

OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

ORIGINAL  
ILLINOIS  
COMMERCE COMMISSION

Consumer Telcom, Inc.

2008 APR 22 P 1:00

Application for a Certificate of  
Interexchange Authority to Operate as a  
Reseller of Telecommunications  
Services Throughout the State of Illinois

CHIEF CLERK'S OFFICE

Docket No.

08-0279

**MOTION FOR PROTECTIVE ORDER**

Consumer Telcom, Inc. ("Applicant"), an applicant for interexchange authority to operate as a reseller of telecommunications services throughout the State of Illinois, hereby moves the Illinois Commerce Commission ("Commission") for an order protecting Applicant's income statement, balance sheet, (collectively "Financial Documents") from disclosure for not less than five (5) years in order to protect highly proprietary information included therein. The Financial Documents are appended as Exhibit E to Applicant's *Application for a Certificate of Interexchange Authority to Operate as a Reseller of Telecommunications Services Throughout the State of Illinois*. In support of its Motion, Applicant states as follows:

1. Applicant has filed an *Application for a Certificate of Interexchange Authority to Operate as a Reseller of Telecommunications Services Throughout the State of Illinois* ("Application") with the Commission, contemporaneously with the instant Motion.

2. Appended as Exhibit E to the Application, as required by the Commission's rules, are Applicant's most recent confidential Financial Statements.

3. These confidential Financial Statements contain highly proprietary and confidential financial information, the disclosure of which to competitors or potential competitors would be detrimental to Applicant.

4. The telecommunications industry is highly competitive, and it is imperative that public disclosure of confidential information contained in the Application be avoided for a period of at least five years following the issuance of an order by the Commission because of the competitive harm which disclosure of such information would likely cause Applicant.

5. Section 7 of the Illinois Freedom of Information Act, 5 ILCS 140/7(g) exempts from public disclosure “trade secrets and commercial or financial information ... where the trade secrets or information are proprietary, privileged or confidential.” The Financial Statements, which are the subject matter of this Motion, fall within this exemption.

6. Applicant seeks an order from this Commission protecting from disclosure in its entirety Applicant’s Financial Statements for a period of not less than five years.

FURTHER, pursuant to ILL. ADMIN. CODE title 83, §200.525 (1996), Applicant respectfully requests that this motion be heard and decided without formal hearing.

WHEREFORE, Applicant respectfully requests that the Commission enter an order protecting from disclosure in its entirety Applicant's Financial Statements for a period of not less than five years.

RESPECTFULLY SUBMITTED THIS 18th day of April, 2008.

CONSUMER TELCOM, INC.

By: 

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